

EXHIBIT 2

Robert Hunter Biden v. Fox News Network, et al., 24-cv-07814

Tina Glandian <tina@geragos.com>
To: "Engel, Steven A." <Steven.Engel@dechert.com>
Cc: "McGinley, Michael" <Michael.McGinley@dechert.com>

Wed, Oct 16, 2024 at 6:47 PM

Thanks Steven. I am waiting for the affidavits of service which I expect tomorrow to confirm the exact times of service but I do know that Fox News was served via the Secretary of State prior to noon yesterday. I will provide you with the affidavits of service as soon as I receive them.

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On Wed, Oct 16, 2024 at 5:31 PM Engel, Steven A. <Steven.Engel@dechert.com> wrote:

Tina:

Fox filed the notice of removal at 1:32 pm ET on October 15. Our records indicate that Fox Corporation was served at 4:45 pm ET on that day.

We do not have any record of Fox News or Mr. Klarman having been served. If you believe that they were served (or that Fox was served earlier), could you provide us with the supporting documentation?

Thanks,

Steve

Steven A. Engel
Partner

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From: Tina Glandian <tina@geragos.com>

Sent: Wednesday, October 16, 2024 2:42 PM

To: Engel, Steven A. <Steven.Engel@Dechert.com>

Cc: McGinley, Michael <Michael.McGinley@dechert.com>

Subject: Re: Robert Hunter Biden v. Fox News Network, et al., 24-cv-07814

[EXTERNAL EMAIL]

Steven, thanks for letting me know that you are representing all defendants and for your agreement to accept service on their behalf. Fox News was served yesterday morning and Mr. Klarman a short while after that. I am fairly certain that both Fox defendants and Mr. Klarman were served before Fox filed its notice of removal in the afternoon. I am waiting to hear back from the clerk about the exact timing of the filing but if you can tell me what time you filed your notice of removal, that would be helpful. As for Mr. Dinh, two attempts at service so far were unsuccessful so I appreciate you accepting service of the attached documents on his behalf.

Thanks,

Tina

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On Wed, Oct 16, 2024 at 12:25 PM Engel, Steven A. <Steven.Engel@dechert.com> wrote:

Tina:

Fox was surprised that Mr. Biden decided to re-file this lawsuit after previously dismissing it. Just confirming that Dechert will represent all defendants in the matter. I understand that you served Fox Corporation (after defendants had removed to federal court); we have not yet received any similar notice for Fox News. We can accept service for the other defendants, including Mr. Dinh and Mr. Klarman, if and when you seek to serve them.

Steve

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From: Aimonetti, Justin <Justin.Aimonetti@dechert.com>

Sent: Tuesday, October 15, 2024 4:10 PM

To: tina@geragos.com

Cc: Engel, Steven A. <Steven.Engel@Dechert.com>; McGinley, Michael <Michael.McGinley@dechert.com>; Levander, Andrew <andrew.levander@dechert.com>

Subject: Robert Hunter Biden v. Fox News Network, et al., 24-cv-07814

Counsel:

Attached please find the Fox Defendants' notice of removal to the Southern District of New York of the action you filed on behalf of Robert Hunter Biden in the Supreme Court of the State of New York, Index No. 159463/2024.

Regards,

Justin W. Aimonetti

Justin W. Aimonetti
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